

Honorable Nathan Deal Governor

Department of Public Safety

Colonel Mark W. McDonough Commissioner

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March 21, 2012

Mr. Julius Genachowski Chairman Federal Communications Commission 445 12th Street, S.W. Washington, D.C.

Dear Chairman Genachowski:

The Georgia Department of Public Safety, on behalf of the State of Georgia, respectfully submits its 700 MHz interoperable mobile public safety broadband waiver petition, attached, along with support letters from the Georgia Bureau of Investigation, the Georgia Department of Natural Resources, the Georgia Department of Corrections, the Georgia Emergency Management Agency, and members of the Georgia Broadband Alliance; Diverse Power Incorporated, Habersham Electric Membership Corporation, Henry County, and their agent, Rural Broadband LLC who had previously submitted a waiver on their behalf.

Georgia is the largest state east of the Mississippi River, covering more than 57,500 square miles, and is home to 9.8 million citizens. Metropolitan Atlanta is a federally-designated Urban Area Security Initiative Region and is the home to Hartsfield-Jackson International Airport, the busiest airport in the world, serving nearly 90 million passengers annually. In addition, the Centers for Disease Control and Prevention are located in Atlanta, placing Georgia at the forefront of a national response to a pandemic or an event involving biological weapons. Two nuclear power plants are located in the state, and the Garden City Terminal of the Port of Savannah is North America's largest single-terminal container facility. The state is home to three Air Force bases, four Army posts, one Marine base, and one Navy base. The Navy base at Kings Bay is one of only two Trident Nuclear Submarine Bases in the country. Atlanta is the nexus for vehicular transportation at the point of intersection for three major interstate highways; I-75, I-85, and I-20. Approximately 110 billion miles are traveled by drivers in Georgia each year. There are 159 counties and over 535 towns and cities in Georgia, with their associated law enforcement, fire, emergency management, and emergency medical service agencies, and these departments are in immediate need of interoperable mobile public safety broadband services. The State of Georgia will not be able to provide those services unless the requested 700 MHz broadband waiver is granted by the FCC to enable spectrum access.

Respectfully submitted,

Colonel Mark W. McDonough

Commissioner

Georgia Department of Public Safety

Nal W. M. Down

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands))	WT Docket No. 06-150
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)))	PS Docket No. 06-229

REQUEST FOR WAIVER OF THE FEDERAL COMMUNICATION COMMISSION'S RULES TO DEPLOY A 700 MHZ PUBLIC SAFETY INTEROPERABLE BROADBAND NETWORK THAT WILL BE BUILT BY A PUBLIC-PRIVATE PARTNERSHIP

Submitted by:

State of Georgia
Georgia Department of Public Safety
Colonel Mark W. McDonough
Commissioner
959 E. Confederate Ave. SE
Atlanta, Georgia 30316

Submittal Date: March 21, 2012

REQUEST FOR WAIVER

Pursuant to Section 1.925(b) of the Commission's rules, the State of Georgia, ("State" or "Georgia") through the Georgia Department of Public Safety ("GADPS") respectfully requests that the Federal Communications Commission ("FCC" or the "Commission") grant a statewide waiver of its 700 MHz public safety early deployment rules to enable the governance, planning, construction and operation of an interoperable public safety broadband network in the 700 MHz band. The requested waiver is consistent with the 21 public safety petitions granted by the Commission in its recent *Waiver Order* ¹ that allows for early deployment of public safety broadband networks in the 700 MHz Band Class 14. Thus, the requested waiver will serve the public interest by improving communications for first responders today without sacrificing any of the policy goals the Commission is seeking to achieve in its 700 MHz rulemaking.

The State of Georgia has identified public safety interoperable broadband services as a priority and is prepared to seek partners to make the investment necessary to deploy a network as quickly as possible in the 700 MHz public safety broadband spectrum. The State envisions the development and build-out of the network through a collaborative effort among both the public and private sector, and through a combination of dedicated public safety and/or privately owned networks. The State's approach is to maximize the utilization of existing facilities and infrastructures that will ensure economics of scale, sustainability and cost efficiencies. The State intends to seek multiple partners to include all waiver petitioners across the state so that broadband services are made available to as many first responders as possible.

Funding for the envisioned 700 MHz interoperable mobile public safety network infrastructure

¹ See Requests for Waiver of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks, PS Docket 06-229, Order, FCC 10-79 (rel. May 12, 2010)("Waiver Order")(granting waivers for: Adams County, CO, Alabama, Boston, MA, Northern California Consortium (Oakland, San Francisco, and San Jose), Charlotte, NC, Chesapeake, VA, District of Columbia, Hawaii and Counties of Maui, Hawaii, Kauai, and City and County of Honolulu, Iowa, Los Angeles County, Mesa, AZ and TOPAZ Regional Wireless Cooperative Mississippi, New Jersey, New Mexico, New York City, New York State, Oregon, Pembroke Pines, FL, San Antonio, TX, Seattle, WA, Wisconsin Consortium (Calumet, Outagamie and Winnebago Counties)).

would come from federal and state grant programs, as well as investments from the participating cities and counties. The State is considering entering into a public-private partnership, if necessary, to assist in financing and sustaining the project in certain parts of the state. Use of the 700MHz public safety broadband spectrum is a critical requirement for the State.

The State of Georgia is dedicated to statewide cooperation and a collaborative effort in building and operating public safety infrastructure to provide the highest level of prevention, protection, response and recovery from acts of terrorism and other catastrophic events in the state and nation. The Commission noted in paragraph 50 of its Waiver grant issued May 12, 2010 (FCC Order, PS Docket No. 06-229, released May 12, 2010) that it was favorably inclined to grant waiver relief to states, stating: "We conclude that waivers for early deployment should meet certain criteria for geographic scope of the proposed deployment. For several reasons, we believe that states provide the most appropriate geographic size for consideration of waiver relief. States offer a reasonable delineation, both geographically and politically, to ensure that deployments are undertaken with sufficient authority, planning and coordination among all state and local public safety agencies within the state. States can also ensure that early deployments are developed to be consistent with overall plans for intra-state interoperability, and can, consistent with existing mechanisms concerning narrowband interoperability, serve as a single interface with the PSST and ERIC to minimize the complexity that would otherwise be inherent in coordinating numerous interactions on a jurisdiction-by-jurisdiction basis. Further, we believe that state-level waiver deployments will facilitate equipment development and purchase, by ensuring that there is a critical mass of potential users even in the early deployment phase to encourage vendors to compete to provide reasonably priced equipment. The public safety community also has experience with interoperability planning at the state level. For example, under a Department of Homeland Security administered Public Safety Interoperable Communications ("PSIC") grant program, each state and territory has developed a statewide communications interoperability plan ("SCIP"). The established governance mechanisms of a state will also facilitate execution of spectrum leases, and coordination of deployments within states and with adjacent states. Finally, we note that state-level systems have the advantage of including a mix of populations, including both urban and rural areas. Thus, state-level governance mechanisms are more likely to ensure that rural areas are included as part of overall deployment plans." The State of Georgia concurs with these statements. Georgia has 159 counties and over 535 towns and cities. It is not reasonable to expect the proper level of cooperation and coordination among such a diverse group unless the Department of Public Safety, on behalf of the State of Georgia, takes a leadership role in the development of a public safety broadband network.

Through multi-jurisdictional collaborations, the State of Georgia can realize significant cost savings by taking advantage of existing capital infrastructure and resources used in the deployment of current voice radio and interoperability networks. The State of Georgia is successfully using a "systemof-regional-systems" approach for the implementation of its Statewide Communications Interoperability Plan for voice radio interoperability now underway. As the system administrator for the Georgia Interoperability Network (GIN), formed under a Law Enforcement Terrorism Prevention Program (LETPP) grant from the Department of Homeland Security, GADPS has experience coordinating a statewide communications system and integrating local systems into a functional statewide network. While the current GIN consists of the deployment of IP-based interface units to interconnect disparate radio systems, GADPS envisions the evolution of the proposed LTE broadband network to encompass voice and data in a true interoperable communications network, consisting of backhaul equipment and a core network. Many of the same steps required to build a voice network -such as hiring consultants, managing the competitive solicitation process, and installing the communications infrastructure –apply equally to building the broadband data part of the network. By collaborating with local/regional entities to simultaneously design and construct an interoperable wireless public safety voice and broadband data network at the same time, the State will avoid duplicated effort and more efficiently marshal its resources. However, the State will only be able to make such efficient use of limited federal, state and local resources if the Commission grants the requested waiver and allows public safety agencies within the State to use the public safety broadband spectrum now.

As demonstrated below, the State's stand-alone network will meet the technical specifications the

FCC has proposed in the *Waiver Order* and can be integrated into a future interoperable National Public Safety Broadband Network. The State of Georgia requests the Commission to act quickly on this request for waiver, as it is consistent with the previously granted Commission's *Waiver Order* ². Grant of the waiver will enable rapid public safety broadband deployment in Band Class 14 in the 700 MHz band, while the network contemplated by the Commission remains years from deployment.

I. INTRODUCTION

Over the last few years, the Commission has taken significant steps to advance nationwide interoperable public safety broadband communications. Despite these efforts, Auction 73 did not result in a winning bidder for the Upper 700 MHz D Block license. Yet there is an urgent need to provide wireless broadband to our first responders. Georgia stands ready to put this 700 MHz spectrum to use and deploy interoperable Long Term Evolution ("LTE") public safety broadband systems that could later be integrated into a nationwide public safety broadband solution, which is consistent with the *Waiver Order* ³ Thereby, allowing early deployments "to take advantage of the current and imminent development of 4G technology by commercial providers, which will provide the technological basis for deployment in the 700 MHz band beginning later this year." ⁴.

In the *Second Report & Order*, the Commission recognized the need to balance two important goals as it crafted the 700 MHz public safety broadband policy: (1) foster a public-private solution to develop nationwide interoperable public safety broadband communications; and (2) enable jurisdictions with available resources to deploy public safety broadband systems on an accelerated basis in some circumstances.⁵ As to the second goal, though the Commission granted the D Block licensee the "exclusive right" to build out the 700 MHz commercial/public safety broadband network (the "Shared

 3 *Id.* at ¶ 40.

 $^{^{2}}$ *Id.* at ¶ 68.

¹a. at 1/40

 $[\]int Id$. at ¶ 10.

⁵ Services Rules for the 698-746,747-762 and 777-792 MHz Bands, Report and Order, 22 FCC Rcd 15289 (2007) ("Second Report & Order").

Wireless Broadband Network")⁶, it created two exceptions to this policy: (1) public safety entities were permitted to undertake an earlier build-out than would be provided for in the Network Sharing Agreement ("NSA"), with the public safety entities entitled to compensation up to the amount the D Block licensee would have incurred if had it constructed the network itself; and (2) public safety could build their own broadband networks in areas not included in the NSA.⁷ Thus, the current early deployment options are premised on D Block licensing and adoption of the NSA. With no D Block licensee and no NSA, and in any event with deployment years away, today there is no clear path for public safety entities in need of broadband solutions.

To that end, the Commission recently clarified that jurisdictions may begin early deployments if they meet the technical requirements for 700 MHz public safety systems and a commitment is made to facilitate roaming and interoperability with the National Public Safety Broadband Network.⁸

II. THE STATE OF GEORGIA NEEDS BETTER PUBLIC SAFETY BROADBAND COMMUNICATIONS AND IS PREPARED TO DEVOTE RESOURCES TO DEPLOY AN INTEROPERATIVE NETWORK IN THE 700 MHZ BAND

In the State of Georgia, there is a dire need for the broadband services that a newly-deployed 700 MHz public safety broadband system would supply:

- The State of Georgia is the largest state east of the Mississippi River and has a population of over 9.8 million. The state is the home to Hartsfield-Jackson International Airport, the busiest airport in the world, serving nearly 90 million passengers annually. There are approximately 1,250 miles of interstate highways throughout the state. Atlanta is the nexus for vehicular transportation at the point of intersection for three major interstate highways, I-75, I-85, and I-20. Approximately 110 traveled billion miles are drivers Georgia by in
- The Centers for Disease Control and Prevention is located in Atlanta, placing Georgia at the forefront of a national response to a pandemic or an event involving biological weapons. Two nuclear power plants are located in the state, and the Garden City Terminal of the Port of Savannah is North America's largest single-terminal container facility. The state is home to three Air Force bases, four Army posts, one Marine base, and one Navy base. The Navy base at Kings Bay, one of only two Trident Nuclear Submarine Bases in the country, is also a member of the GIN. These factors clearly illustrate that Georgia needs a reliable, dedicated system to deliver mission-critical information in real-time to first responders in the event of a disaster.
- The majority of the Georgia's public safety first responders must function without broadband

⁶ *Id.* at ¶ 470.

⁷*Id.* at ¶ ¶ 471-84.

⁸ Waiver Order at ¶ 10.

wireless communications or fund prohibitively high recurring monthly charges for commercial wireless services. Because of the lack of Public Safety oriented broadband wireless connectivity, police officers must return to their district stations to access routine criminal justice information. Routine information would be readily available to officers in the field if broadband data access was available.

- State of Georgia firefighters lack connectivity to wireless broadband service for all front line fire
 department companies because commercial services are too costly. A Public Safety Wireless
 Network would allow firefighters to access real-time full-motion video capabilities and provide
 situational information to other first responders, either en-route or at the scene, as well as to
 supporting companies in response to an emergency.
- State of Georgia first responders lack connectivity to wireless broadband services that support public safety as a priority and have the ability to pre-empt other lower priority users during public safety emergencies and disasters. Priority and pre-emption are not available from commercial wireless service providers today.

With broadband wireless communications resources available to first responders in the State of Georgia:

- O Police officers will know quickly and silently whether the vehicle they are stopping is stolen, whether the individual they are interviewing is wanted or dangerous, will conduct photo lineups of suspects while still at a crime scene, and will be able to access webenabled surveillance cameras in public facilities to gain intelligence critical to the safe resolution of blockaded or hostage incidents;
- Firefighters will know which routes are blocked due to construction or accidents, which
 hydrants are out of service, and what hazardous conditions exist as soon as the data is
 updated by police, water departments and building inspectors;
- Medics will be able to stream patient's vitals and video of the patient to emergency rooms, where doctors will be able to better and more quickly diagnose and issue orders for treatment while the ambulance is en-route to the hospital; and
- Emergency Managers will be able to receive real-time data and video from incident sites, teleconference with the Incident Commanders, and quickly share critical information, and mobilize essential resources to the ensure the swift and safe resolution of the emergency situation

The State of Georgia is prepared to deploy a public safety broadband network in the 700 MHz band as soon as practicable. Deployment of such a network in the State of Georgia will enhance day-to-day, task force and mutual aid response through support of a full spectrum of interoperable IP multimedia applications, including:

- Streaming video (surveillance, remote monitoring)
- Digital Imaging

- Automatic Vehicle Location
- Computer Aided Dispatching
- Email
- Mapping/GIS
- Remote Database Access
- Report Management System Access
- Text Messaging
- Telemetry/Remote Diagnostics
- Web Access

A broadband public safety network in the State of Georgia will support applications that cannot be supported over existing narrowband or wide band wireless data technologies. Tasks requiring the consumption of substantial time to communicate between dispatchers and other officers on narrowband voice systems (e.g., database lookups and dispatch messaging) will be off-loaded to broadband spectrum, significantly reducing narrowband channel load. In addition, allowing police officers, for example, to have remote access to databases (e.g., DMV records, warrants, missing persons and stolen vehicle databases, etc.), remote form entry and reporting and web access will enhance public safety by increasing officer efficiency, reducing paperwork and allow officers to spend more of their time patrolling.

Broadband networks will allow mission-critical information to be exchanged in real-time, anytime, anywhere. Distribution of images (floor plans, mug shots, incident stills), videos (surveillance feeds, on-scene video), messaging, access to incident management databases provide a common operating picture and access to information from the field, enhancing both incident response and first responder safety. Finally, broadband networks will allow for the secure, easy and interoperable sharing of information (voice, video and multi-media data) among members of a task force.

To realize these benefits, the State needs the Commission's authorization to operate the State's network until it can be integrated into the larger National Public Safety Broadband Network. For the following reasons, the public interest will be served if the Commission grants the waiver requested herein as soon as possible.

III. THE REQUESTED WAIVER IS IN THE PUBLIC INTEREST AND SHOULD BE GRANTED.

To obtain a waiver of the Commission's rules, a petitioner must demonstrate either that (1) the

underlying purpose of the rule(s) would not be served or would be frustrated by application to the present case, and that a grant of the waiver would be in the public interest, or (2) in view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome, or contrary to the public interest, or the applicant has no reasonable alternative.⁹

Under either of these standards, the requested waiver allowing the State of Georgia to deploy a public safety broadband network in advance of he National Public Safety Broadband Network is justified.

A. Grant of the Waiver Will Enable the State of Georgia to Deploy an Interoperable Broadband Network to Serve First Responders.

The tragic events of September 11, 2001 and Hurricane Katrina made clear that public safety entities need more interoperable communications capabilities. The reality is that the deployment of a nationwide network from which local public safety entities can obtain broadband services is likely years away. The State of Georgia is willing to commit resources to bridge this gap so that its first responders can utilize broadband technology to protect life and property immediately.

The public safety broadband spectrum is the State's only reasonable option for broadband communications. Previously, spectrum allocation to public safety was fragmented throughout the frequency ranges, and only made available for voice communications. Further, the 4.9 GHz spectrum is not adequate for large scale, wide area deployments, as its propagation characteristics require significant investment in infrastructure. All other potential spectrum options, including 2.4 GHz Wi-Fi and television white space, do not allow for licensing, rendering systems susceptible to interference and thus unacceptable for public safety use. The 700MHz broadband spectrum is the only viable solution for a cost effective, statewide interoperable mobile public safety broadband system.

While the State waits for resolution of the Commission's proceeding, the public interest requires that the State of Georgia be allowed to deploy their own interoperable, broadband public safety communications networks, as was recently granted to the 21 jurisdictions in the *Waiver Order*. In these

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⁹ 47 C.F.R. § 1.925(b)(3). Waiver applicants face a high hurdle and must plead with particularity the facts and circumstances that warrant a waiver. WAIT Radio v. FCC, 413 F.2d 1153, 1157 (D.C. Cir. 1969)(WAIT Radio), aff'd, 459 F.2d 1203 (1973), cert. denied, 409 U.S. 1027 (1972).

unique circumstances, waiver of the rules limiting such deployment to Band Class 14 of the 700 MHz Block will serve the public interest.

B. The Network Will Be Robust and Will Satisfy the Technical Specifications Proposed by the Commission in the Waiver Order.

LTE is a commercial open standard technology which is being deployed by commercial wireless operators in the commercial portions of the 700 MHz band today. The State of Georgia believes that the selection of LTE as the common air interface technology for use in the public safety 700 MHz band is the first step toward achieving the goal of nationwide interoperability. The State of Georgia plans to deploy a LTE network to support public safety operations. This LTE system will be deployed to operate on a paired assignment of 10 MHz wide channels in the public safety broadband block between 788-793 MHz for mobile transmission and 758-763 MHz for base station transmission. At a minimum, the equipment operating in the band will be compliant with Band Class 14 as specified in the 3GPP Release 8 standards.¹⁰

Moreover, at a minimum, the State's LTE system deployed in the Public Safety Broadband Block will initially support the applications specified in the *Waiver Order*: (1) Internet access, (2) VPN access to any authorized site and to home networks, (3) a status or information "homepage," (4) access to responders under the Incident Command System, and (5) field-based server applications. In addition, the State agrees with the Commission, public safety equipment manufacturers and commercial wireless service providers that roaming must be a "fundamental requirement." Therefore, the State will support roaming to all 700 MHz Band Class 14 public safety operators and support roaming to future regions and Tribal public safety operators as specified in the *Waiver Order* 13. Finally, the State will adhere to the technical criteria that the Emergency Response Interoperability Center (ERIC) establishes via Commission rules. 14

¹⁰ Waiver Order at \P 47.

¹² Waiver Order at ¶ 45.

¹¹ *Id.* at ¶ 46.

¹³ *Id.* at ¶ 45.

¹⁴ *Id.* at ¶ 36.

IV. CONCLUSION

The Commission would significantly advance the cause of public safety by allowing the State of Georgia to deploy its own public safety broadband network in Band Class 14 that would operate until a National Public Safety Broadband Network is established in the 700 MHz band. The State of Georgia stands ready to begin deployment of life-saving broadband services, and respectfully requests that the Commission expeditiously grant this waiver requested.

Respectively Submitted,

Colonel Mark W. McDonough, Commissioner

Georgia Department of Public Safety

Mal W. M. Doroy

State of Georgia





3121 Panthersville Road P.O. Box 370808 Decatur, Georgia 30037-0808

Vernon M. Keenan Director

March 19, 2012

Colonel Mark McDonough, Commissioner Georgia Department of Public Safety 959 E. Confederate Avenue, S.E. Atlanta, Georgia 30316

Dear Colonel McDonough:

The Georgia Bureau of Investigation supports the Department of Public Safety in submitting a waiver to the Federal Communications Commission on behalf of the Georgia public safety community regarding "D" block communications. We agree this initiative "will significantly advance the cause of public safety" and support efforts to deploy a statewide system until the National Public Safety Broadband Network is established.

Additionally, we would request to participate with any advisory board or technical committee formed that would have oversight and guide the implementation of LTE for public safety in the State of Georgia.

Please feel free to contact me if you would like to discuss this matter further.

Sincerely,

Vernon M. Keenan

V_Mken

Director

VMK:mj

cc: Deputy Director Rusty Andrews



MARK WILLIAMS COMMISSIONER

DAN FORSTER DIRECTOR

March 1, 2012

Colonel Mark McDonough Myn oslulzwr Commissioner, Georgia DPS 959 E. Confederate Ave. SE Atlanta, Georgia 30316

Dear Colonel McDonough,

After the meeting last week at DPS Headquarters concerning "D" block communications, Captain England briefed Major Adams and myself on the proposal and need for action on this waiver. The Georgia Dept. of Natural Resources, Law Enforcement Section believes this request is in the best interest of our agency and supports the Department of Public Safety submitting a waiver to the Federal Communications Commission on behalf of the Georgia public safety community. We agree this initiative "will significantly advance the cause of public safety", and support efforts to deploy a statewide system until the National Public Safety Broadband Network is established.

Additionally, we would request to participate with any advisory board or technical committee formed that would have oversight and guide the implementation of LTE for public safety in the State of Georgia. Please feel free to contact me if you would like to discuss this matter further.

Best regards,

Colonel Eddie Henderson Chief of Law Enforcement

EH/sba

cc:

Lt. Colonel Jeff Weaver Major Stephen Adams Major Walter Rabon Captain Mike England RECEIVED

MAR - 1 2012

Dept. of Public Safety Commissioner's Office

GEORGIA DEPARTMENT OF CORRECTIONS



COMMISSIONER'S OFFICE SUITE 866, EAST TOWER 2 MARTIN LUTHER KING, JR. DRIVE, S.E. ATLANTA, GEORGIA 30334-4900 404/656-4644 FAX 404/651-6818

Nathan Deal Governor **Brian Owens Commissioner**

March 20, 2012

Colonel Mark McDonough Commissioner, Georgia Department of Public Safety 959 East Confederate Avenue, S.E. Atlanta, Georgia 30316

Dear Colonel McDonough:

The purpose of this letter is to express my support of the Department of Public Safety in spearheading the initiative to submit a waiver to the Federal Communications Commissions' rules to deploy a 700 MHZ Public Safety Interoperable Broadband Network ("D" block communications).

The Georgia Department of Corrections (GDC) recognizes the payoff in implementing such a system statewide and stands ready to fulfill any responsibilities associated with the enhancement of Georgia's public safety community.

Director Arnold Smith will continue to function as the GDC representative. I am aware of, and support his request for a GDC subject matter expert to serve as a member of any Process Action Team (PAT), advisory board, or other technical committee associated with the planning, coordination, and execution of this important effort. Director Smith can be reached at (478) 992-5939 or smitha00@dcor.state.ga.us.

Sincerely,

Commissioner

Georgia Department of Corrections

Cc:

Arnold Smith, Director

Operations, Planning, and Training Division

BO:frs

GEORGIA EMERGENCY MANAGEMENT AGENCY GEORGIA OFFICE OF HOMELAND SECURITY

NATHAN DEAL GOVERNOR



CHARLEY ENGLISH
DIRECTOR

February 29, 2012

Colonel Mark McDonough
Commissioner
Georgia Department of Public Safety
Post Office Box 1456
Atlanta, Georgia 30371-1456

Dear Colonel McDonough:

The Georgia Emergency Management Agency (GEMA) fully supports the submission of the request for waiver of the FCC rules to develop a 700 MHz interoperable public safety broadband network. Georgia should not wait until a federal model is developed and then subject the State to a design which may not meet our needs and strategic goals for interoperable communications. GEMA also concurs that the Georgia Department of Public Safety (DPS) is best suited to serve as the lead agency in this State endeavor and looks forward to working with DPS and the other State agencies in the successful development and implementation of the 700 MHz interoperable public safety broadband network.

If I can provide further information, please contact me at 404-635-7001.

Sincerely.

Charley English

ce/pi

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MAR - 2 2012

Dept. of Public Safety, Commissioner's Office



Diverse Power Incorporated 1400 South Davis Road P.O. Box 160 LaGrange, GA 30241-0003 706-845-2000 706-845-2020 fax www.diversepower.com





February 29, 2012

Federal Communications Commission Public Safety & Homeland Security Bureau 445 12th Street S.W. Washington, D.C. 20554

RE: 700 MHz Waiver Request by the State of Georgia Department of Public Safety

Pursuant to our participation in a Waiver Petition filing submitted by the Georgia Broadband Alliance to the Federal Communications Commission on August 2, 2010, this letter is intended to communicate Diverse Power's support of the State of Georgia Department of Public Safety's (the "Georgia DPS") waiver request for use of 700 MHz broadband frequencies on behalf of and within the State of Georgia to facilitate the development and operation of a standards based 700 MHz interoperable broadband public safety network (the "Public Safety Network"). Diverse Power will cooperate and coordinate with the Georgia DPS, the State of Georgia, and other regional partners on the proposed development and operation of the Public Safety Network in the Diverse Power service area.

Wayne Livingston, President/CEO

6135 State Hwy. 115 W., P.O. Box 25, Clarkesville, GA 30523-0095 Phone (706) 754-2114 or (800) 640-6812

March 1, 2012

Federal Communications Commission Public Safety & Homeland Security Bureau 445 12th Street S.W. Washington, D.C. 20554

RE: 700 MHz Waiver Request by the State of Georgia Department of Public Safety

Pursuant to our participation in a Waiver Petition filing submitted by the Georgia Broadband Alliance to the Federal Communications Commission on August 2, 2010, this letter is intended to communicate Habersham EMC's support of the State of Georgia Department of Public Safety's (the "Georgia DPS") waiver request for use of 700 MHz broadband frequencies on behalf of and within the State of Georgia to facilitate the development and operation of a standards based 700 MHz interoperable broadband public safety network (the "Public Safety Network"). Habersham EMC will cooperate and coordinate with the Georgia DPS, the State of Georgia, and other regional partners on the proposed development and operation of the Public Safety Network in the Habersham EMC service area.

Sincerely,

Todd Pealock President & CEO



Fredric L. Auletta
140 Henry Parkway
McDonough, GA 30253
fredauletta@co.henry.ga.us
770. 288.6270
770. 288.6271 (fax)

DEPUTY COUNTY MANAGER

March 1, 2012

Federal Communications Commission Public Safety & Homeland Security Bureau 445 12th Street S.W. Washington, D.C. 20554

RE: 700 MHz Waiver Request by the State of Georgia Department of Public Safety

Pursuant to our participation in a Waiver Petition filing submitted by the Georgia Broadband Alliance to the Federal Communications Commission on August 2, 2010, this letter is intended to communicate Henry County, Georgia's ("Henry County") support of the State of Georgia Department of Public Safety's (the "Georgia DPS") waiver request for use of 700 MHz broadband frequencies on behalf of and within the State of Georgia to facilitate the development and operation of a standards based 700 MHz interoperable broadband public safety network (the "Public Safety Network"). Henry County will cooperate and coordinate with the Georgia DPS, the State of Georgia, and other regional partners on the proposed development and operation of the Public Safety Network in Henry County.

Sincerely,

Fred Auletta

Deputy County Manager

Don Ash

Henry County EMA / E-911 Director

Clark Rainer

Henry County Technology Services Director

Rural Broadband, LLC

Lake Side Center 15 Lake Street, Suite 270 Savannah, Georgia 31411 Phone: 912 598-7223 Fax 912 598-9444

March 1, 2012

Federal Communications Commission Public Safety & Homeland Security Bureau 445 12th Street S.W. Washington, D.C. 20554

RE: WT Docket 06-150 and PS Docket 06-229, 700 MHz Waiver Request by the State of Georgia Department of Public Safety

Pursuant to our participation in a Waiver Petition filing submitted by the Georgia Broadband Alliance to the Federal Communications Commission on August 2, 2010, this letter is intended to communicate the support of the Rural Broadband, LLC and the Georgia Broadband Alliance to the State of Georgia Department of Public Safety's (the "Georgia DPS") waiver request for use of 700 MHz broadband frequencies on behalf of and within the State of Georgia to facilitate the development and operation of a standards based 700 MHz interoperable broadband public safety network (the "Public Safety Network"). Rural Broadband, LLC and the members of the Georgia Broadband Alliance intend to cooperate and coordinate with the Georgia DPS, the State of Georgia, and other regional partners on the proposed development and operation of the Public Safety Network in their respective service areas.

Sincerely yours,

Rural Broadband, LLC

J. Allen Davis

President